

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA**

SIMRET SEMERE TEKLE,

Plaintiff,

v.

NOUF BINT NAYEF ABDUL-AZIZ AL
SAUD MOHAMMAD BIN ABDULLAH AL
SAUD

Defendants.

Case No.: 1:18-cv-211

I, MARTINA E. VANDENBERG, DECLARE:

1. I am an attorney at the Human Trafficking Legal Center and counsel to Plaintiff Simret Semere Tekle in the above-captioned matter.

2. Appended hereto as Exhibit A is a true and accurate copy of the Nov. 14, 2017 Letter from Anteron P. Herbert to Martina Vandenberg.

3. On March 12, 2019, I—along with my co-counsel Richard Levy, Agnieszka Fryszman, and Sarah Bessell—met and conferred with Defendants’ counsel John Brownlee, Stuart Nash, and David Haller over the telephone. During that call, I requested that Defendants provide authorization for release of the employment contract through Ms. Tekle’s FOIA request. Counsel for Defendants replied that they would respond by March 15, 2019.

I declare, under penalty of perjury under the laws of the United States and Virginia that the foregoing is true and correct, and that I executed this Declaration on March 22, 2019 in Washington, DC.

/s/Martina Vandenberg
Martina Elizabeth Vandenberg
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